

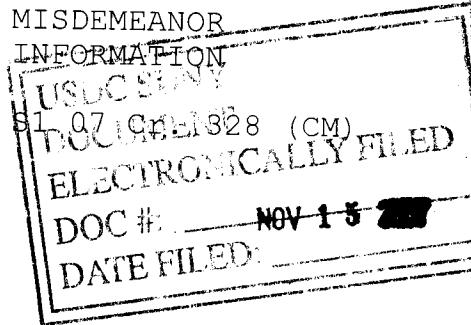
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
UNITED STATES OF AMERICA

v.

WILLIE PACE,

Defendant.



-----x  
COUNT ONE

The United States Attorney charges:

From in or about April 2000, through in or about March 2007, in the Southern District of New York and elsewhere, WILLIE PACE, the defendant, unlawfully, willfully and knowingly, did embezzle, steal, purloin, and convert to her use, money and things of value of the United States and a department and agency thereof, to wit, the United States Department of Housing and Urban Development, and did receive, conceal, and retain the same with intent to convert it to her use and gain, knowing it to have been embezzled, stolen, purloined and converted, the value of which did not exceed the sum of \$1,000, to wit, PACE received federal housing subsidies, to which she was not entitled, through fraud and deceit.

(Title 18, United States Code, Sections 641 and 2.)

Michael J. Garcia  
MICHAEL J. GARCIA  
United States Attorney